

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DEBRA RICHMOND-PROHASKA,

Plaintiff,

v.

ETHICON INC, ETHICON LLC,

Defendants.

Case No. 2:23-cv-00210-JLR

**STIPULATION REGARDING  
PLAINTIFF'S REQUEST TO AMEND  
FIRST AMENDED COMPLAINT AND  
DEFENDANTS' MOTION TO DISMISS**

**Noted for Consideration: June 29, 2023**

After receiving Defendants' Motion to Dismiss Plaintiff's First Amended Complaint (Dkt. No. 13), counsel for Plaintiff Debra Richmond-Prohaska informed counsel for Defendants Ethicon Inc. and Ethicon LLC that Plaintiff intended to dismiss Defendant Ethicon LLC and seek leave to file a Second Amended Complaint. Having reviewed Plaintiff's proposed Second Amended Complaint, the parties agree as follows:

1. Plaintiff will file a stipulation dismissing all claims against Ethicon LLC;
2. Defendants consent to Plaintiff's request to file her Second Amended Complaint;
3. Defendants agree to strike the pending Motion to Dismiss Plaintiff's First Amended Complaint (Dkt. No. 13), reserving all rights to renew a Motion to Dismiss following filing of the Second Amended Complaint;
4. Defendants shall have 20 days from the date of filing of the Second Amended Complaint to answer or otherwise respond to Plaintiff's Second Amended Complaint.

1 *IT IS SO STIPULATED.*

2 Dated: June 29, 2023.

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4 Respectfully submitted,

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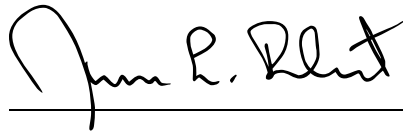
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*Counsel for Plaintiff*

**[PROPOSED] ORDER**

IT IS SO ORDERED. Plaintiff is granted leave to file her Second Amended Complaint. Defendant's Motion to Dismiss (Dkt. No. 13) shall be stricken, and Defendant(s) have 20 days from the filing of the Second Amended Complaint to respond to such complaint.

DATED: June 29, 2023



The Honorable James L. Robart  
UNITED STATES DISTRICT JUDGE